

# **EXHIBIT 7**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JAMES CONTANT, et al.,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION, et al.,

Defendants.

No. 1:17-cv-3139-LGS

**DECLARATION IN  
SUPPORT OF MUFG  
BANK, LTD.'S  
MOTION TO DISMISS  
FOR LACK OF PERSONAL  
JURISDICTION**

Tony Goulart, III, declares under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a Managing Director in the Controllers & Tax Services Division of MUFG Union Bank, N.A., which is an indirect subsidiary of, and performs various financial reporting services for, MUFG Bank, Ltd. (“MUFG Bank”). I submit this declaration in support of MUFG Bank’s motion to dismiss the above-captioned action for lack of personal jurisdiction. The facts stated herein are true and correct, to the best of my knowledge based on publicly available information and records maintained by MUFG Bank in the ordinary course of business.

2. MUFG Bank is a financial institution incorporated in Japan under the Company Law. Its headquarters are and have been located at 2-7-1, Marunouchi, Chiyoda-ku, Tokyo, Japan. MUFG Bank’s principal place of business is and has been in Japan. MUFG Bank was formerly known by the name The Bank of Tokyo-Mitsubishi UFJ, Ltd.

3. At all relevant times, MUFG Bank’s U.S. branch operations (and, by extension, the New York branch operations) were small when compared to its global operations.

3.1 For the fiscal year ended March 31, 2018, MUFG Bank's New York branches had net income of \$61 million, as reported in accordance with MUFG Bank's Tokyo Head Office instructions. This represents approximately 1.1% of MUFG Bank's consolidated "Net income attributable to the shareholders of MUFG Bank," as disclosed in its Annual Securities Report for the fiscal year ended March 31, 2018.

3.2 For the fiscal year ended March 31, 2018, the New York, Chicago and Los Angeles branches of MUFG Bank had combined net income of \$117 million, as reported in accordance with MUFG Bank's Tokyo Head Office instructions. This represents approximately 2.2% of MUFG Bank's consolidated "Net income attributable to the shareholders of MUFG Bank," as disclosed in its Annual Securities Report for the fiscal year ended March 31, 2018.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, based on publicly available information and records maintained by MUFG Bank in the ordinary course of business.

Executed on December 20, 2018 in Oakland, California.

  
Tony Goulart, III